

<p>UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY Caption in compliance with D.N.J. LBR 9004-1</p>	
<p>GIBBONS P.C. Karen A. Giannelli, Esq. Mark B. Conlan, Esq. Brett S. Theisen, Esq. One Gateway Center Newark, New Jersey 07102 Telephone: (973) 596-4500 Facsimile: (973) 596-0545 E-mail: kgiannelli@gibbonslaw.com mconlan@gibbonslaw.com btheisen@gibbonslaw.com <i>Counsel to the Debtors and Debtors-in-Possession</i></p>	
<p>In re: NEW ENGLAND MOTOR FREIGHT, INC., <i>et al.</i>, Debtors.¹</p>	<p>Chapter 11 Case No. 19-12809 (JKS) (Jointly Administered) Hearing Date: May 14, 2019 @ 11:00 a.m. Judge: Hon. John K. Sherwood</p>
<p>NEW ENGLAND MOTOR FREIGHT, INC. <i>et al.</i>, Plaintiffs, v. PARTIES LISTED ON EXHIBIT A TO THE COMPLAINT and JOHN DOES 1-100, Defendants.</p>	<p>Adv. Proc. No. 19-1119 (JKS)</p>

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

ADJOURNMENT REQUEST

1. I, BRETT S. THEISEN, ESQ.,

☒ am the attorney for: New England Motor Freight, Inc. et al., Debtors And Debtors In Possession,

☐ am self represented,

and request an adjournment of the following hearings for the reason set forth below.

Matters:

- **Adv. Proc. No. 19-1119—**
 - Debtors' Motion to Enjoin Auto Liability Claims [Dkt. No. 3]
 - Cross-Motion for Relief from the Automatic Stay [Dkt. No. 9]
- **Lead Case No. 19-12809—**
 - Motion for Relief from the Automatic Stay [Dkt. No. 266]
 - Motion for Relief from the Automatic Stay [Dkt. No. 378]
 - Motion for Relief from the Automatic Stay [Dkt. No. 436]
 - Motion for Relief from the Automatic Stay [Dkt. No. 440]

Current hearing date and time: May 14, 2019 @ 10:00 a.m.

New date requested: May 28, 2019

Reason for adjournment request: The parties to the above-referenced matters have agreed to (i) adjourn the matters for two weeks to enable further settlement negotiations, and (ii) consent to an extension of the temporary restraining order entered in Adv. Proc. No. 19-1119, Dkt. No. 22, through and including the new hearing date, May 28, 2019.

The parties also request that the current deadline to submit further pleadings in support of, or opposition to, the pending matters be extended from May 13, 2019 at 12:00pm to May 27, 2019 at 12:00pm.

A proposed order extending the temporary restraining order is being submitted contemporaneously herewith.

All of the matters listed above are related to existing or potential Auto Liability Claims against the Debtors, and have been previously adjourned to allow for settlement negotiations to take place. At an initial hearing held on April 16, 2019, the Court granted the Debtors' request for a temporary restraining order sought by the Motion to Enjoin Auto Liability Claims [Adv. Proc. No. 19-1119, Dkt. 3], and directed the parties to the above-referenced matters to meet and confer regarding a protocol to govern

the orderly resolution of all Auto Liability Claims. On April 26, 2019, the Court extended the TRO through May 14. The parties are continuing to develop a consensual protocol, and hereby seek an additional two week adjournment and extension of the TRO to continue those negotiations.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: May 8, 2019

/s/ Brett S. Theisen
Brett S. Theisen, Esq.

COURT USE ONLY:

The request for adjournment is:

- | | | |
|--|--|-------------------------------------|
| <input checked="" type="checkbox"/> Granted | New hearing date: <u>5/28/2019 @ 11:00</u> | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Granted over objection(s) | New hearing date: _____ | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Denied | | |